



## Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

courts, one feature of which is that there must always be citation before hearing, even where the alleged contempt was committed in the presence of the court. *Boyd v. Glucklich* (C. C. A. 8th Cir.), 116 Fed. 131. Citing, upon the point last mentioned, *Ex parte Robinson*, 19 Wall. 505.

---

**FIXTURES—REQUISITES—LAUNDRY MACHINERY.**—To transmute chattels into realty, it must appear, first, that the chattels were actually annexed to the real estate or to something appurtenant thereto; second, that they were applied to the use or purpose to which that part of the realty to which they were connected was appropriated; third, that they were annexed with the intention to make a permanent accession to the freehold, though it is not necessary to make the annexation *perpetual*; it is sufficient if they are attached with the intention that they shall remain there until they are worn out in business. *Atlantic S. D. & T. Co. v. Atlantic City Laundry* (Ct. Chan. N. J.), 53 Atl. 212. Citing *Feder v. Van Winkle*, 53 N. J. Eq. 370, 51 Am. St. Rep. 328.

Pursuant to the foregoing, certain laundry machinery—the engine being bolted to a stone foundation, an ironing machine connected above to the shafting and below with the boiler, an “annihilator,” “tumblers” and washing machines—were adjudged to pass with a mortgage of the real estate.

*Green v. Phillips*, 26 Gratt. 759, and *Shelton v. Ficklin*, 32 Gratt. 727, propound the general principle of which the principal case presents pertinent illustrations.

See 1 Va. Law Register, 626.

---

**EASEMENTS—IN GROSS OR APPURTEnant—CONVEYANCE.**—A written conveyance, under seal, from the owner of land to S. & E., conveying a strip of land to the latter for the purpose of building a spur track from the main stem of a railroad to the stone quarry, the stone and the right to mine it having been previously purchased from another by S. & E., and reserving the right to re-enter when S. & E. “get through using said road in working quarry,” conveyed an easement which is appurtenant to the dominant estate of S. & E., and which passed to their successors in title in the quarry, although the conveyance of the strip contained no words of assignability. *Stovall v. Coggins Granite Co.* (Ga.), 42 S. E. 723.

Per Simmons, C. J.:

“An easement in gross is a mere personal right in the land of another, while an easement appurtenant is an incorporeal right which is attached to and belong to some greater or superior right. In determining whether a right granted is appurtenant or in gross, courts must consider the terms of the grant, the nature of the right and the surrounding circumstances, giving effect as far as possible to the legally ascertained intention of the parties, but favoring always the construction of the grant as an easement appurtenant rather than of a right in gross.” Citing *Karmuller v. Krotz*, 18 Iowa, 352; *Lide v. Hadley*, 36 Ala. 627, 76 Am. Dec. 338; *Hall v. Turner*, 110 N. C. 292.